

REMARKS

Claims 21-25 are pending in this application. Claims 1-20 have been canceled without prejudice or disclaimer of subject matter. Claims 21-25 have been added. Claims 21, 24, and 25 are independent.

The specification was objected to for the reasons given in paragraphs 3 and 4.

Specifically, at paragraph 3 of the Office Action, the Examiner required a new title. The title has been amended to make it more descriptive, as required in the Office Action. In particular, the title has been amended to --GENERATING JPEG2000 ENCODED DATA IN A CLIENT MANAGED BY A SERVER--, as kindly suggested by the Examiner.

At paragraph 4 of the Office Action, the Examiner objected to the specification for not including a CROSS REFERENCE TO RELATED APPLICATIONS section directed to the foreign priority applications. While Applicants have so amended the specification, Applicants note that there is no requirement that foreign priority applications be cross-referenced in the specification. (Only domestic priority applications need be cross-referenced.)

For all the foregoing reasons, it is respectfully requested that the objection to the specification be withdrawn.

At paragraph 5 of the Office Action, Claims 1, 2, 8, 10, and 12 were objected to for various informalities. Cancellation of Claims 1, 2, 8, 10, and 12 renders this objection moot.

Claim 12 was rejected under 35 U.S.C. § 101 for being directed to non-statutory subject matter. Cancellation of Claim 12 renders the rejection of that claim moot.

Claims 1-13 were rejected under 35 U.S.C. § 112, as being indefinite. While cancellation of Claims 1-13 renders the rejection of those claims moot, Applicants note that the new claims have been carefully drafted as deemed necessary to ensure that they conform fully to the requirements of Section 112, second paragraph, with special attention to the points raised in paragraph 8 of the Office Action.

Regarding the Examiner's comments at paragraph 2 of the Office Action, cancellation of Claims 1-20 renders this issue moot as well; however, Applicants do not concede the propriety of the Examiner's comments.

Claims 1-13 were rejected under 35 U.S.C. § 103(a) as being obvious from *Deshpande* ("HTTP Streaming of JPEG2000 Images" – IEEE, 2001, pages 15-19) in view of *Marcellin* ("JPEG2000: Highly Scalable Image Compression" – IEEE, 2001, pages 268-272).

First, cancellation of Claims 1-13 renders the rejections of those claims moot.

Claim 21 is directed to an encoded data generation method executed by a client, which generates a new encoded data file based on an encoded data downloaded from

a server which manages JPEG 2000 encoded image data including encoded data of a plurality of tiles. Encoded data of each tile has a hierarchical structure.

The client specifies a portion of the JPEG 2000 encoded image data based on an instruction of a target area to be decoded in an image and an instruction of the size of an output image, and requests the server to send the encoded data of the specified portion.

If encoded data is sent from the server in response to the request, the client stores, in a memory, the sent encoded data. The client generates, in the memory, management tables for managing each of tiles. The management table is used for storing information indicating which hierarchy encoded data included in the encoded data of a tile has been stored in the memory and indicating an address, in the memory, of each hierarchy encoded data in the registered encoded data.

Whenever the encoded data sent from the server is registered in the memory, the client updates the management table corresponding to the registered encoded data.

When a management table of a tile of interest is updated, the client generates an independent JPEG 2000 encoded image data file of the tile of interest. The independent JPEG 2000 encoded image data file has a hierarchical structure and includes the encoded data of the tile of interest registered in the memory and dummy data if the tile of interest has lack of encoded data for completion of the hierarchical structure.

The client determines, based on the management tables, whether or not there is a tile having all of hierarchy encoded data in the memory. If it is determined that

there is a tile having all of hierarchy encoded data in the memory, the client deletes information of the determined tile from the management table of the determined tile.

When the client requests the server to send the encoded data of the specified portion, the request for sending encoded data of the specified portion, excluding the hierarchy encoded data having been registered in the memory, is sent to the server.

Accordingly, by virtue of the features of Claim 21, the client does not request the hierarchy encoded data that has been registered in the memory. Furthermore, after generating the independent JPEG 2000 encoded image data file of the tile having all of hierarchy encoded data in the memory, the client does not update the generated independent JPEG 2000 encoded image data file.

Deshpande, as understood by Applicants, relates to HTTP streaming of JPEG2000 images. Fig. 1, cited in the Office Action, relates to an HTTP streaming architecture.

Marcellin, as understood by Applicants, relates to highly scalable image compression, and in particular to the feature set of the JPEG2000 compression standard and to the algorithm.

Applicants have found nothing in *Deshpande* or *Marcellin*, whether considered either separately or in any permissible combination (if any) that would teach or suggest that whenever encoded data sent from a server is registered in a memory, a management table corresponding to the registered encoded data is updated and an

independent JPEG 2000 encoded image data file corresponding to the updated management table is generated, as recited in Claim 21.

Furthermore, Applicants have found nothing in *Deshpande* or *Marcellin*, whether considered either separately or in any permissible combination (if any) that would teach or suggest a technique for determining, based on the management tables, whether or not there is a tile having all of the hierarchy encoded data in the memory, as recited in Claim 21.

Applicants have also found nothing in *Deshpande* or *Marcellin*, whether considered either separately or in any permissible combination (if any) that would teach or suggest that, if it is determined that there is a tile having all of hierarchy encoded data in the memory, deleting information of the determined tile from the management table of the determined tile, as recited in Claim 21.

For at least the foregoing reasons, it is submitted that Claim 21 is patentable over *Deshpande* and *Marcellin*, whether considered either separately or in any permissible combination (if any).

Independent Claims 24 and 25 are apparatus and computer-readable medium claims, respectively, corresponding to method Claim 21, and are believed to be patentable for at least the same reasons as discussed above in connection with Claim 21.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as

references against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of the patentability of each on its own merits is respectfully requested.

Also in the Office Action, Claims 1-13 were provisionally rejected for obviousness-type double patenting over Claims 1-7, 13-19, 25-30, 37, and 43-45 of U.S. Appln. No. 10/231,206.

It is noted that cancellation of Claims 1-13 renders the rejections of those claims moot. Further, Appln. No. 10/231,206 has been abandoned; as such, the double patenting rejection is moot for that reason as well.

An Information Disclosure Statement was submitted on November 29, 2007.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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FCIS_WS 1982080v1